

# **EXHIBIT B**

1 STUART F. DELERY  
Assistant Attorney General  
2 Civil Division  
COLIN KISOR  
3 Acting Director, Office of Immigration Litigation  
District Court Section  
4 WILLIAM C. SILVIS  
Acting Assistant Director  
5 CHRISTOPHER HOLLIS  
Trial Attorney  
6 EREZ REUVENI  
Trial Attorney

7  
8 United States Department of Justice  
Office of Immigration Litigation,  
District Court Section  
9 P.O. Box 868, Ben Franklin Station  
Washington, DC 20044  
10 Phone: (202) 532-4135  
Christopher.Hollis@usdoj.gov

11 Attorneys for Respondents

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO, CALIFORNIA**  
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17 DE ABADIA-PEIXOTO, <i>et al.</i> ,	)	Case No. C 11-04001-RS (LB)
	)	
18 Petitioners,	)	<b>DECLARATION OF JEFF</b>
	)	<b>ROSENBLUM</b>
19 vs.	)	
	)	
20 <i>UNITED STATES DEPARTMENT OF</i>	)	
<i>HOMELAND SECURITY, et al.</i> ,	)	
	)	
21	)	
	)	
22 Respondents.	)	
	)	
23	)	
	)	
24	)	

25 I, Jeff Rosenblum declare as follows:

26 1. I serve as the General Counsel of the Executive Office for Immigration  
27 Review (EOIR). In this capacity, I provide legal counsel and litigation assistance on  
28 matters pertaining to the Immigration and Nationality Act and other laws and

1 procedures as they relate to EOIR, among other duties. I have served in this position  
2 since my appointment in 2012.

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4 2. I have prepared this declaration to explain EOIR's compliance with this  
5 court's January 23, 2014, Preliminary Approval Order.

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7 3. EOIR complied with the Preliminary Approval Order by posting the  
8 required "Notice of Proposed Class Action Settlement" or "Notice" on its website in  
9 English, Spanish, and Chinese on January 30, 2014.

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11 4. EOIR posted the Notice on its website in the Punjabi language on  
12 January 31, 2014, due to inaccuracies in the Punjabi translation.

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14 5. Per agreement between the parties, Plaintiffs provided finalized versions  
15 of the Notice in English, Spanish, Chinese, and Punjabi (collectively the "Notices") to  
16 Defendants. EOIR then utilized its contract court interpreters to check the accuracy of  
17 the Spanish, Chinese, and Punjabi translations, correct any inaccuracies, and provide  
18 the Notices back to Plaintiffs for approval prior to posting on EOIR's website. The  
19 interpreter reviewing the Punjabi translation of the Notice found numerous  
20 inaccuracies in the translation, requiring extensive revisions to the document. As a  
21 result, EOIR posted the Punjabi translation of the Notice after extensive revision of  
22 the document, and after EOIR's changes to the document were accepted by Plaintiffs.

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24 6. EOIR has maintained copies of the Notices to provide as alternate forms  
25 of notice upon request by an individual detainee. To the best of my knowledge, we  
26 have not received requests for copies of Notices in alternate form.

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28 7. As of the signing of this declaration, the Notices remain posted on  
EOIR's website.

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3 I declare under penalty of perjury that the foregoing is true and correct.  
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5 Dated: March 5, 2014

  
6 JEFF ROSENBLUM  
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